

**REMARKS**

In view of the foregoing amendments and the following remarks, Applicants respectfully submit that all pending claims are in condition for allowance, an indication of which is respectfully requested.

As a preliminary matter, Applicants thank Examiner Vu and supervisory Examiner Moise for the thoughtful courtesies and kind treatments afforded to Applicants' representative, Babak Akhlaghi, during the telephonic interview conducted on June 2, 2010. This response reflects the substance of the interview.

During the interview, Applicants representative pointed out that U.S. Patent Number 6,895,502 ("Fraser") fails to anticipate claim 1 of the instant application. In particular, it was submitted that Fraser fails to describe or suggest a client device configured to access the anti-tampering memory area and the non-volatile memory area in response to an access request via the common interface in the storage medium, the common interface being configured to issue a plurality of sequential responses to the access request, an access for the non-volatile memory area being arranged to be saved when the access request is made before a last response of the plurality of sequential responses, and the access for the non-volatile memory area being performed after the last response reaches, as previously recited in claim 1. No specific agreement was reached in this regard.

However, Examiner Vu agreed that if claim 1 is amended to further clarify that there are first and second access requests and response to each of the first and second access requests includes a plurality of sequential responses such that when the second access request is made before a last response of the plurality of sequential responses to a previous access request, the second access request is saved and performed after the last response to the previous access

request, then the claims would distinguish over Fraser. In reliance on this agreement, Applicants have amended claim 1 to recite a remote access system that includes, among other features, a client device configured to access the anti-tampering memory area and the non-volatile memory area via the common interface in the storage medium in response to a plurality of access requests, the common interface being configured to issue a plurality of sequential responses to each of the plurality of access requests, an access for the non-volatile memory area being arranged to be saved when the access request for the non-volatile memory area is made before a last response of the plurality of sequential responses to a previous access request, and the access for the non-volatile memory area being performed after the last response to the previous access request.

For at least this reason, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 1, along with its dependent claims.

#### **Claim Objections**

Claim 1 was objected to because of an informality. It is respectfully submitted that the amendments to claim 1 obviate this objection. Therefore, Applicants respectfully request reconsideration and withdrawal of the above-stated objection.

#### **Claim Rejections – 35 U.S.C. § 112**

Claims 1-8 were rejected under 35 U.S.C. § 112, first paragraph, as allegedly failing to comply with the written description requirement. The Office Action asserts the recitation “a plurality of sequential responses to the access request” is not disclosed in the instant application. Applicants disagree. During the interview, it was discussed that the instant application clearly

describes that an access request can include a plurality of sequential responses. For example, as shown in FIG. 14, the instant application describes a set of sequential responses including “response 1” and “response 2.” These sequential responses are generated in response to an access request to CPU 2030. Another set of sequential responses “response 3” and “response 4” is generated in response to an access request for file. Furthermore, as pointed out above and requested by the Examiner, claim 1 has been amended to clarify that each of the plurality of access requests results in a plurality of sequential responses.

For at least the foregoing reasons, Applicants respectfully request reconsideration and withdrawal of the above-stated rejection under § 112, first paragraph.

Claims 1-8 were also rejected under 35 U.S.C. § 112, second paragraph, as allegedly being indefinite. It is respectfully submitted that the amendments to claim 1 obviate this rejection. Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection under § 112, second paragraph.

**Claim Rejections - 35 U.S.C. § 102**

Claims 1 and 5 were rejected under 35 U.S.C. § 102(e) as being anticipated by Fraser. As pointed out above and in light of the agreement reached with the Examiners, claim 1 has been amended to recite a remote access system that includes, among other features, a client device configured to access the anti-tampering memory area and the non-volatile memory area via the common interface in the storage medium in response to a plurality of access requests, the common interface being configured to issue a plurality of sequential responses to each of the plurality of access requests, an access for the non-volatile memory area being arranged to be saved when the access request for the non-volatile memory area is made before a last response of

the plurality of sequential responses to a previous access request, and the access for the non-volatile memory area being performed after the last response to the previous access request.

Therefore, Applicants respectfully request reconsideration and withdrawal of the rejection of claim 1, along with its dependent claims.

**Claim Rejections - 35 U.S.C. § 103(a)**

Claims 2-4 were rejected under 35 U.S.C. § 103(a) as being unpatentable over Fraser. Claim 6 was rejected under § 103(a) as being unpatentable over Fraser in view of U.S. Patent Publication Number 2003/0040929 ("Knegendorf"). Claim 7 was rejected § 103(a) as being unpatentable over Fraser in view of U.S. Patent Number 5,652,892 ("Ugajin"). Claim 8 was rejected under § 103(a) as being unpatentable over Fraser in view of U.S. Patent Number 6,920,561 ("Gould"). Claims 2-4 and 6-8 variously dependent from claim 1. However, the secondary references were cited for alleged teachings of various features recited in the dependent claims and do not suggest the aspects of claim 1 discussed above. Hence, none of the proposed combinations satisfy claim 1 or any of the claims dependent on claim 1. Applicants therefore respectfully request reconsideration and withdrawal of the rejections of claims 2-4 and 6-8.

**Conclusion**

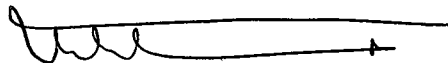
Having fully responded to all matters raised in the Office Action, Applicants submit that all claims are in condition for allowance, an indication for which is respectfully solicited. If there are any outstanding issues that might be resolved by an interview or an Examiner's amendment, the Examiner is requested to call Applicants' attorney at the telephone number shown below.

**Application No.: 10/566,943**

To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper, including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP



Babak Akhlaghi  
Limited Recognition No. L0250

600 13<sup>th</sup> Street, N.W.  
Washington, DC 20005-3096  
Phone: 202.756.8000 BA:MWE  
Facsimile: 202.756.8087  
**Date: June 7, 2010**

**Please recognize our Customer No. 20277  
as our correspondence address.**